

REMARKS

Applicant has amended claims 36 and 39 to overcome the objection to these two claims. The preamble in claim 39 has been amended exactly as suggested by the Examiner. In claim 36, the access control cards have been amended so that it is clear that they correspond to the plurality of external security modules. Accordingly, the objection to claims 36 and 39 should now be withdrawn.

The rejection of claims 1, 5-8, 10-18, 24-28, 36-38 and 43-47 under 35 USC 103(a) has been unpatentable over USP 6,405,369 to Tsuria, in view of US Publication 2006/0161976 to Kahn et al, is respectfully traversed.

Applicant wishes to respectfully point out that the method of claim 1 involves the control of the pairing of the decoder residing in one digital data reception equipment with a plurality of external security modules, each having a unique identifier.

The primary reference Tsuria uses two separate decoders 10 and 12, each of which must be activated, using two smart cards 18 and 22 respectively. Accordingly, Tsuria does not teach the pairing of a decoder of one digital data reception equipment with a plurality of external security modules (emphasis added). Tsuria teaches an entirely different methodology from that taught in the subject application and requires "chain data" inclusive of either a signature, a key, or a seed to correlate, validate, identify and authenticate the second smart card. A second smart card is essential in Tsuria and "chain data" is essential for the validation of the

second smart card.

The Examiner admits that Tsuria fails to teach pairing of the digital data reception equipment with a plurality of different external security modules, each having a unique identifier and instead looks to the teaching of Kahn which the Examiner suggests teaches pairing more than one CAM (security module) to an IRE (digital reception equipment). However, Kahn requires the generation of a selective list as indicated by the Examiner in paragraph 0041, which has no place in the subject method. In the subject application the unique digital data reception equipment must pair up with different (emphasis added) external security modules with each having a memorized unique identifier. If one has a selective list as taught in Kahn for pairing one of a plurality of security modules with a given digital reception equipment, this would avoid the need for the unique identifier to cooperate with the digital reception equipment for controlling reception and for determining if the unique identifier is memorized as is required in claim 1. In other words, if Kahn knows from the selective list exactly how to pair up a plurality of different security modules to one digital reception equipment, no need would exist to utilize a unique identifier and to determine if the unique identifier of each external security module is memorized or not memorized. Kahn, however, does not teach each CAM being different and each having a unique identifier.

As explained above, Tsuria is dependent upon a methodology using "chain data" to authenticate and validate the second smart card which is not relevant to the subject invention and Kahn is dependent upon use of a "selective list" which does

not exist in the method of the subject invention or in Tsuria.

For all of the above reasons, claim 1 is clearly patentable over Tsuria taken alone or in combination with Kahn and the rejection thereof should be withdrawn.

Claims 5-8, 10-18 and 24-28 are all dependent upon claim 1 and should therefore be patentable for the same reasons as given above.

Tsuria does not teach a decoder with a plurality of access control cards corresponding to a plurality of external security modules to manage access to digital data and neither does Kahn et al. Accordingly, claim 36 is clearly patentable over Tsuria taken alone or in combination with Kahn.

Claims 37 and 38 depend from claim 36 and are therefore believed to be patentable for the same reasons as given above.

Claims 43-47 depend from claim 1 and are therefore patentable for the same reasons as indicated heretofore.

The rejection of claims 29-35 and 39-42 under 35 USC 103(a) as being unpatentable over Tsuria in view of USP 7,457,967 to Cocchi et al, is respectfully traversed.

Claim 29 has been amended to correspond to the amendment to claim 1. As explained heretofore in connection with claim 1, the digital data reception equipment is used for pairing equipment to a plurality of different security modules, each having a unit identifier to manage access to digital data distributed by an operator. This is

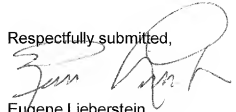
not taught in Tsuria which requires two smart cards and does not teach pairing a decoder of one digital data reception equipment to a plurality of external security modules. Tsuria uses an entirely different methodology, requiring the use of "chaining data" to correlate, validate, identify and authenticate the second smart card. Accordingly, claims 29-35 are clearly patentable over Tsuria, taken alone or in combination with Cocchi et al, which also does not teach pairing a decoder of one digital data reception equipment to a plurality of external security modules, each having a unique identifier to manage access to digital data.

Claim 39 has also been amended to overcome the objection with respect to the preamble thereof, as well as to specifically limit the claim to pairing a decoder in the digital data reception equipment to a plurality of external security modules, each having a unique identifier which is clearly not the case in Tsuria for all of the reasons given heretofore. Accordingly, claim 39 is considered patentable over Tsuria, taken alone or in combination with USP 7,457,967 to Cocchi et al.

Claims 40-42 depend from claim 39 and are therefore believed patentable for the same reasons as given above.

Reconsideration and allowance of claims 1, 5-8, 10-18 and 24-47 is
respectfully solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Eugene Lieberstein', is written over the typed name and registration number.

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